

Exhibit 4

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
DEMOCRACY NORTH CAROLINA;)
NORTH CAROLINA BLACK)
ALLIANCE; LEAGUE OF WOMEN)
VOTERS OF NORTH CAROLINA,)
))
Plaintiffs,)
))
vs.) Civil Action No.
))
ALAN HIRSCH, in his) 1:23CV00878-TDS-JEP
official capacity as CHAIR)
OF THE STATE BOARD OF)
ELECTIONS; JEFF CAMERON)
III, in his official)
capacity as SECRETARY OF)
THE STATE BOARD OF)
ELECTIONS; STACY EGGERS IV,)
in his official capacity as)
MEMBER OF THE STATE BOARD)
OF ELECTIONS; KEVIN LEWIS,)
in his official capacity as)
MEMBER OF THE STATE BOARD)
OF ELECTIONS; SIOBHAN)
O'DUFFY MILLEN, in her)
official capacity as MEMBER)
OF THE STATE BOARD OF)
ELECTIONS; KAREN BRINSON)
BELL, in her official)
capacity as EXECUTIVE)
DIRECTOR OF THE STATE BOARD)
OF ELECTIONS; NORTH)
CAROLINA STATE BOARD OF)
ELECTIONS,)
))
Defendants.)
DEPOSITION OF DEMOCRACY NORTH CAROLINA, BY AND
THROUGH ITS 30(B)(6) DESIGNEE,
CHERYL CARTER
10:08 A.M.
TUESDAY, MARCH 18, 2025

1 Assembly prior to 2010?

2 A. I was not around at that time so I -- I don't
3 know.

4 Q. Okay. So I know you guys do a lot of
5 different things, but at a high level, can
6 you explain to me the sort of work that
7 Democracy NC is engaged in on a yearly basis.

8 A. Yes. So our work is centered around our
9 organizing, policy, and communications team
10 working together, working -- as you can
11 imagine, the organizing team in the
12 communities to advocate for policies within
13 the community and also to organize our
14 community members so that they are aware of
15 various laws and bills that are pertaining to
16 their right to vote.

17 Our policy team is working with our
18 State Board of Elections, our county Board of
19 Elections and also looking at any bills that
20 are coming out of the General Assembly that
21 may impact the right to vote.

22 Our communications team is working on
23 our digital presence and communicating with
24 our advocates and it really depends whether
25 it's an odd year or an even year because odd

1 years, we engage around municipal elections,
2 but that's not the only work we do. We also
3 have -- one of our flagship programs is our
4 Democracy Summer internship that is going
5 into its 26th year. That is a program we do
6 every summer, but it's not just a summer
7 program. Those interns stay with us, engage
8 with us throughout the year into the years
9 when they become what we call Democracy
10 Summer alumni.

11 So we do a variety of programs and
12 campaigns that aren't just related to the
13 election, but we will engage around the
14 elections as well to inform, to educate, to
15 ensure that people understand where they need
16 to vote, what's on the ballot, and whatever
17 information that they need to ensure that
18 they can cast their ballot.

19 Q. Okay. So that's a great -- that's a great
20 overview. Going to ask you a couple
21 follow-up questions.

22 So I think I heard you say that you'd
23 engage with -- Democracy NC engages with
24 their community members; is that right?

25 A. Yes.

1 concerned, whether we're talking about
2 immigration, gun violence, healthcare, all of
3 those depend on who elected officials are so
4 all of those issues connect to voting rights.
5 So even though we don't broadly work on those
6 issues, we understand the intersectionality
7 of those issues. So voting rights is
8 protecting people's basic rights and access
9 to care, access to housing, access to things
10 that enable them to be part of the community.

11 Q. Does Democracy NC also work for pro democracy
12 reforms?

13 A. Yes, we do.

14 Q. What do you -- do you have an understanding
15 of -- what does pro democracy reform mean to
16 you?

17 A. So pro democracy reform would mean those
18 things that make it easier for eligible
19 voters to be able to vote. So we ensure that
20 there are enough days that people can -- can
21 vote, that the hours are available especially
22 when we think about working-class people,
23 working families. We want to -- them to have
24 as many days available so that they can vote,
25 so that there can be access especially for

1 faith-based communities. We ask for
2 Saturdays and Sundays depending upon
3 somebody's faith. So as much as possible, we
4 want to make the act of voting as positive
5 and easy as possible for eligible voters.

6 Q. And when you're talking about the number of
7 days and the hours for voting, are you
8 referring to early voting generally?

9 A. Yes.

10 Q. Okay.

11 A. Yes.

12 Q. And to the best of your knowledge, North
13 Carolina has several days of early voting; is
14 that right?

15 A. Yes.

16 Q. Okay.

17 A. Yes, it does.

18 Q. And has early voting days on the weekends?

19 A. Yes, it does.

20 Q. And does early voting, to the best of your
21 knowledge, also have hours that are outside
22 of normal business hours that people can go
23 and vote?

24 A. Yes, it does.

25 Q. Okay. I think you said historically,

1 Q. Okay. You mentioned the change in 747 to
2 absentee -- for the receipt deadline for
3 absentee ballots; is that right?

4 A. Yes.

5 Q. And you understand that the complaint in this
6 case does not challenge that portion of 747?

7 A. Yes, I do.

8 Q. Okay. Going back to something you said a
9 little bit ago, can you tell me about your
10 Democracy Summer program.

11 A. Yes. So Democracy Summer program started in
12 1999 and what we do is recruit college
13 students, North Carolina residents attending
14 North Carolina colleges, universities, and
15 community colleges, and we bring them into
16 Democracy North Carolina after a very robust
17 and comprehensive recruitment and selection
18 process to teach them about what we do.
19 Whether it's an organizing, policy,
20 communications, operations, or development,
21 they have an opportunity as college students
22 to learn about the work that we do. They
23 learn how to advocate. They learn public
24 speaking. They learn about fundraising.
25 They learn how an organization like us

1 operates. They learn HR. So it's a -- it's
2 a really amazing opportunity especially for
3 anyone that's a -- at any level of college,
4 but we do not, except for our policy
5 department, accept graduate students.

6 Q. Okay. So in order to be eligible to
7 participate in the Democracy Summer program,
8 you have to be a -- either a college student
9 or a community college student enrolled at a
10 North Carolina university and be a resident
11 of --

12 A. Yes.

13 Q. -- North Carolina? Okay.

14 A. Yes.

15 Q. How long does the Democracy NC summer program
16 last?

17 A. Nine weeks.

18 Q. Okay. And is that a paid internship?

19 A. Yes, it is.

20 Q. All right.

21 MS. RIGGINS: I would like to mark as
22 Exhibit 2 -- the nonstapled copied -- a
23 document that was produced by Democracy NC in
24 discovery. These would be audited financial
25 statements for years ending 2023 and 2022.

1 (CARTER EXHIBIT 2, Democracy North
2 Carolina Audited Financial Statements, Years
3 Ended December 31, 2023 and 2022, Bates
4 DemNC_0006973 - 996, was marked for
5 identification.)

6 MS. RIGGINS: And for the folks
7 following along on Teams, that's D- --
8 DemNC_0006973 through 6996.

9 BY MS. RIGGINS:

10 Q. And I promise I'm not going to ask you about
11 the entirety of this document. It's long.

12 Okay. Does this look at all familiar to
13 you?

14 A. Yes, it does.

15 Q. Okay. I'd like to flip to numbered Page 9 of
16 this document that has a Bates number ending
17 in 6983. Do you see a header on the top of
18 this page that says, Note 1, Organization?

19 A. Yes.

20 Q. Okay. So I think this kind of nicely
21 summarizes a little bit of what we've been
22 talking about with regard to Democracy NC's
23 mission, but I want to ask about some
24 specific things --

25 A. Uh-huh.

1 Q. -- on the page.

2 All right. So the top paragraph here
3 under Note 1 says that the organization,
4 Democracy NC, is organized for charitable and
5 educational purposes, to promote public
6 discussion about the vitality of democracy in
7 North Carolina.

8 Do you agree with that statement?

9 A. Yes, I do.

10 Q. Okay. And it's also organized to increase
11 voter education; is that right?

12 A. Yes.

13 Q. All right. And do you agree that that's
14 still Democracy NC's purpose?

15 A. Yes.

16 Q. All right. And also to increase voter
17 registration and civic participation within
18 the state.

19 Do you see that?

20 A. Yes.

21 Q. Is that also still part of Democracy NC's
22 purpose?

23 A. Yes --

24 Q. All right.

25 A. -- it is.

1 Q. And then examine the influence of private
2 money on public policy in elections.

3 Do you see that?

4 A. Yes.

5 Q. Is that the campaign finance reform --

6 A. Yes --

7 Q. -- you were --

8 A. -- it is.

9 Q. -- talking about?

10 A. Uh-huh.

11 Q. Okay. What sort of work are you guys doing
12 there?

13 A. Examining the influence of private money?

14 Q. Yes.

15 A. Currently, we're in the developmental phase
16 of that because that team has several members
17 that are new on staff so there's some
18 research and compiling of data that's
19 happening right now with that.

20 Q. Okay. So is that sort of a newer thing --

21 A. Yes.

22 Q. -- that you guys are looking into?

23 A. Yes. Yes, it is.

24 Q. All right. And then the last clause in that
25 sentence says, evaluate the relative

1 importance of various governmental reforms
2 including public financing of elections as
3 part of Democracy NC's organizational
4 purpose; is that right?

5 A. Yes.

6 Q. Okay. What other various governmental
7 reforms other than public financing of
8 elections does Democracy NC look at?

9 A. I would also say anything that's related to
10 voting rights and pro democracy reform.

11 Q. What about the right to organize, like,
12 organized labor, does Democracy NC put out
13 communications to advocate about that?

14 A. We support organizations that are organizing
15 around labor, but I wouldn't say that that's
16 a -- a -- one of our priorities.

17 Q. And that brings a light bulb to something
18 else you said earlier. I think earlier, you
19 talked about your partner organizations when
20 we were talking about how you engage with
21 your --

22 A. Uh-huh.

23 Q. -- communities.

24 So what kind of partner organizations
25 are those?

1 A. Most of those organizations are pro democracy
2 organizations. Some are statewide; some are
3 regional. We also, as I mentioned, work with
4 faith-based organizations. We work with the
5 Divine Nine, other social organizations such
6 as that.

7 Q. Okay. So what's a pro democracy
8 organization?

9 A. I would say other organizations similar to
10 ours that are listed in the -- the -- the
11 lawsuit, North Carolina Black Alliance,
12 League of Women Voters, organizations like
13 those.

14 Q. Okay. Okay. And then further down on Page 9
15 here I think you talked about -- earlier
16 about how you had different wings of the
17 organization working on advocacy and
18 communications and organizing.

19 So does this sort of summarize what you
20 were saying earlier?

21 A. Yes.

22 Q. Okay. And so under organizing, again, it
23 talks about here bringing together diverse
24 groups of people to focus on shared advocacy
25 and civic engagement goals; is that right?

1 understanding of how government works so that
2 they can use their influence and power as
3 citizens, as voters to advocate for policies
4 that work for them.

5 Q. Okay. So it sort of sounds like you're
6 advocating for the voting rights of North
7 Carolinians; is that fair?

8 A. Yes, that's correct.

9 Q. All right.

10 MS. RIGGINS: I'd like to mark as
11 Exhibit 3 a document that was produced in
12 discovery, and it's Bates labeled
13 DemNC_0004880 through 4882.

14 (CARTER EXHIBIT 3, Informational Sheet
15 about Democracy NC, Bates DemNC_0004880 -
16 882, was marked for identification.)

17 BY MS. RIGGINS:

18 Q. I'll give you a minute to flip through this.
19 Have you ever seen this document before?

20 A. I don't recall seeing this document. I mean,
21 I'm familiar with the work that we did in
22 these years --

23 Q. Okay.

24 A. -- but not familiar with this document.

25 Q. Okay. I've got a couple questions about some

1 types of calls at -- through the hotline.

2 Q. Okay. And so the basic information you
3 referenced earlier, is that something like,
4 can you help me find my polling place, or
5 some -- or, what are the hours of my polling
6 place, something like that?

7 A. Yes.

8 Q. Okay. All right. Now we can move on.
9 Mobilize under the How We Do It. So it says
10 here that you guys partner with face-ba- --
11 faith-based communities and other advocacy
12 groups; is that right?

13 A. Yes, that's correct.

14 Q. All right. And we've talked about the other
15 advocacy groups that Democracy NC partners
16 with already; is that right?

17 A. Yes, that's correct.

18 Q. What sort of faith-based communities are you
19 guys partnering with?

20 A. We partner with a number of faith-based
21 communities, Baptist communities, AME Zion
22 communities, just pretty much any faith-based
23 organization that has similar beliefs and
24 wants to ensure that we are removing the
25 barriers to vote.

1 Q. Okay. And are these faith-based
2 organizations usually also organizing or
3 present in the marginalized communities that
4 were referenced on this page, too, so
5 low-wealth community, black or brown
6 communities, things like that?

7 A. Generally speaking, but I can't say always
8 that that's the case.

9 Q. Okay. And the next bullet here is,
10 recruiting and training volunteers to educate
11 and engage voters; is that right?

12 A. Yes, that's correct.

13 Q. So is this something kind of colloquially
14 known sometimes as get out the vote efforts?

15 A. Yes, colloquially. As an organizer who has
16 done actual get out the vote, I really prefer
17 mob- -- saying mobilization because when you
18 say get out the vote, that's really a
19 particular term. But as you said, so many
20 people use that terminology and it's become
21 so popular so, yes, I would say that most
22 people think of it as get out the vote, but
23 it's really much more than that.

24 Q. Okay. So you said that you think get out the
25 vote has a particularized meaning so what do

1 (CARTER EXHIBIT 4, GOTV Activities for
2 the 2022 General Election, Bates
3 DemNC_0007350 - 358, was marked for
4 identification.)

5 MS. RIGGINS: So for folks following
6 along on Teams, this is DemNC_0007350 through
7 7358.

8 BY MS. RIGGINS:

9 Q. Does this document look familiar with you?
10 And feel free to flip through it if you need
11 a minute.

12 A. Yes, it does.

13 Q. Okay. And this is called GOTV, or Get Out
14 the Vote, Activities for the 2022 General
15 Election; is that right?

16 A. Yes, it is.

17 Q. Okay. Can you tell me a little bit about
18 what this document shows at a high level.

19 A. This document shows our outreach. It breaks
20 down our digital outreach, some of our
21 organizing outreach, our social media, our
22 resources that we produced, our NC voter
23 website and the touches and outreach that
24 happened there. So it's an overview of the
25 ways that we were able to engage and touch

1 voters.

2 Q. Okay. The header that's a little bit further
3 down than halfway on the page that says, GOTV
4 Advocate Actions, do you see that?

5 A. Yes, I do.

6 Q. There's an acronym in that first sentence
7 there, NPVE.

8 A. Yes.

9 Q. What does NPVE stand for?

10 A. That's nonprofit voter engagement.

11 Q. And so it looks like in 2022, at least
12 Democracy NC gave some mini grants to
13 nonprofit voter engagement groups, Faith
14 Ambassadors, and Adopt-a-Precinct election
15 protection; is that right?

16 A. Yes.

17 Q. What's adopt a precinct election protection?

18 A. So those are regional organizations that have
19 volunteers who we provide a mini grant for
20 the organization so that they can recruit
21 poll monitors.

22 Q. Okay. And so it looks like Democracy NC in
23 2022 gave out 47 of those mini grants; is
24 that right?

25 A. That's correct.

1 most likely age group to vote by mail? Is
2 that right?

3 A. Yes, in 2020.

4 Q. Okay. And it looks like it says -- voters
5 aged 18 to 25 is referenced in that bullet;
6 is that right?

7 A. That's correct.

8 Q. Okay. Do you know how Democracy NC came up
9 with the age range 18 to 25 to analyze?

10 MS. SPOTO: And, Counsel, I'm just
11 going to step in to caution the witness not
12 to disclose any confidential internal
13 deliberations within the organization as
14 protected by the First Amendment. So to the
15 extent it's not getting into that, you can
16 answer.

17 THE WITNESS: Okay.

18 A. 18 to 25 is the general age range when we
19 think of college students.

20 Q. Okay. Because in one of the exhibits we
21 looked at earlier, you were looking at 35 and
22 under --

23 A. Yes.

24 Q. Okay. -- for your supporters. All right.

25 And so if you flip to the next page

1 which would be Pages 6 and 7 -- sorry. It
2 was produced with two pages side by side
3 printed on here so it's a little hard to
4 follow.

5 A. Okay.

6 Q. The Bates number is 472 in the right corner.
7 Do you see that?

8 A. Yes, I do.

9 Q. Okay. So there's a section here that talks
10 about voter registration and breaks down
11 voter registration by race and ethnicity; is
12 that right?

13 A. That's correct.

14 Q. Okay. And then if you turn the page to Pages
15 8 and 9 of the document, Bates labeled Pages
16 473, it also breaks down voter registration
17 in North Carolina by age; is that right?

18 A. Yes, it does.

19 Q. Okay. And so the age groups we've talked
20 about before -- we've got 18 to 25, but now
21 we've also got 26 to 40, 41 to 65, and 66 and
22 older.

23 Do you see that?

24 A. Yes, I do.

25 Q. Okay. Do you know how Democracy NC made the

1 determinations to break voters down into
2 these specific age groups?

3 MS. SPOTO: And I'll just provide the
4 same caution as before.

5 THE WITNESS: Okay.

6 A. I would say somewhat similar, the 18 to 25 is
7 college age, then 26 to 40 may represent a
8 certain generation, and then 41 to 65 and 66
9 and -- and older.

10 Q. Okay. All right. And then turning the page
11 to the page Bates labeled 474, there's a
12 Section 2 that begins here on voter turnout.

13 Do you see that?

14 A. Did you say 474?

15 Q. It's that one right there.

16 A. Okay.

17 Q. It's red. Sorry.

18 A. That's okay.

19 Q. That's what I get for trying to save trees
20 and print things double-sided.

21 So do you see a Section 2 here called,
22 Voter Turnout?

23 A. Yes, I do.

24 Q. Okay. And on this page is the voter turnout
25 broken down by race, ethnicity, and age?

1 about that.

2 Q. No. That's fine.

3 So you may have told me this earlier
4 and, if you did, I'm sorry. Approximately
5 how many Democracy Summer internships do you
6 guys give out every year?

7 A. Anywhere from 20 to, I'd say, 22.

8 Q. And I know that in order to be eligible to
9 participate in the Democracy Summer program,
10 you've got to attend a North Carolina
11 university, college, or community college.
12 You've got to be a North Carolina resident.

13 What if you went to college a little
14 later and you were 26, is there an age
15 restriction on the program in addition to
16 being in college or could you be in college
17 and be 26 and participate in the program?

18 A. There is not an age restriction.

19 Q. Okay. And then you talked about how when
20 you're -- is it friendterns with a D --

21 A. (Nods head).

22 Q. Okay. -- friendterns go back to their
23 campuses --

24 A. Uh-huh.

25 Q. -- they might be eligible for a grant; is

1 that right?

2 A. Yes.

3 Q. Can you tell me a little bit more about that.

4 A. So during the course of their internship,
5 they decide if they want to apply for this
6 and it would be a grant where they're going
7 back. They can be doing mobilization work,
8 education work, as long as it's something
9 that's supporting and continuing the efforts
10 that they've learned with us. It can be
11 related to that election cycle, but it also
12 can be other types of advocacy.

13 Q. Okay. What -- what are some other types of
14 advocacy that it could be?

15 A. It could be where they are advocating around
16 any legislative agenda that may be happening
17 or it could be community based. It could
18 even be something related to their particular
19 university or community college or the
20 community where they're living.

21 Q. So talking about the college students who are
22 eligible --

23 A. Uh-huh.

24 Q. -- for the Democracy Summer program and then
25 can go back and advocate on their campus,

1 that's correct.

2 Q. Okay.

3 A. Yes.

4 Q. So it wouldn't be true that 18- to
5 25-year-olds in 2020 utilized same-day
6 registration at a higher rate?

7 MS. SPOTO: Objection to form. You can
8 answer to the extent you know.

9 A. I wouldn't know their comparison to other
10 voters because that's what we're talking --

11 Q. Uh-huh.

12 A. -- that they use it at a higher rate than
13 other demographic of voters.

14 Q. Okay. And the voter turnout has not been
15 published for 2024; is that right?

16 A. That's correct.

17 MS. SPOTO: Objection to form. You can
18 answer.

19 A. That's correct.

20 Q. How has Democracy NC been harmed by the
21 same-day registration change in 747?

22 A. How we've been harmed. As I referenced
23 earlier, engaging in voter education, civic
24 education, it takes considerable work because
25 it's not always the person that you're

1 speaking directly to that you're
2 disseminating that information to. You -- we
3 may speak at a church. We may speak at a
4 organization's gathering and what we're doing
5 is educating the people in front of us with
6 the thinking that they're then going to take
7 it back to their networks, to their
8 communities. So whenever there's a change --
9 and especially in this situation, this is so
10 technical and in the weeds that helping
11 people to understand -- we have to strike a
12 balance between arming them with the
13 information so that they can be prepared with
14 not scaring people so that they say, well, if
15 it's that difficult, I'm just not going to
16 bother to vote, because that's one thing we
17 don't want to happen. We want to ensure that
18 people are voting so giving them as much
19 information as possible.

20 So those are ways. I would say another
21 way is with our resources because, as you saw
22 with the voter guides, with all the other
23 resources, any time there's a change, we have
24 to change our resources. And so that's a
25 printing cost, that's a staff cost, personnel

1 because we have to review all of that
2 information to ensure that we're being as
3 accurate as possible.

4 So in all of those ways that Democracy
5 NC can be impacted. And, as I mentioned, our
6 organizing team, our policy team, our comms
7 team, development team -- I mean, our whole
8 staff has to have a basic understanding if
9 they're not as much in the weeds as some of
10 the experts on staff.

11 Q. Okay. But nothing in 747 prevented Democracy
12 NC from advising North Carolina voters on how
13 to use same-day registration; is that right?

14 MS. SPOTO: Objection to form. You can
15 answer.

16 A. Can you say that again?

17 Q. Sure. Did anything in Senate Bill 747
18 prevent Democracy NC from advising North
19 Carolina voters on how to use same-day
20 registration?

21 MS. SPOTO: And same objection.

22 MS. RIGGINS: What was wrong with the
23 form on that?

24 MS. SPOTO: It's the -- it seemed
25 confusing --

1 A. Yes, I do.

2 Q. Okay. And it cites to some really
3 interesting work, in my opinion, done by
4 Tufts on youth voting; is that right?

5 A. Yes.

6 Q. And that's a source, this circle at Tufts,
7 that you guys use pretty regularly in your
8 communications; is that right?

9 MS. SPOTO: Objection to form. You can
10 answer.

11 A. Yes. I would say so.

12 Q. Okay. So I'd like to look at some of -- of
13 this Tufts cite.

14 MS. RIGGINS: Mark this as Exhibit 11.

15 (CARTER EXHIBIT 11, Tufts Article, One
16 Week Away From Election Day, Most States Are
17 Behind 2020 in Youth Voter Registration,
18 October 30, 2024, was marked for
19 identification.)

20 BY MS. RIGGINS:

21 Q. And this is from Tufts, an article published
22 October 30th, 2024; is that right? Do you
23 see that date?

24 A. Yes.

25 Q. Okay. And that was five days before the 2024

1 general election; is that right?

2 A. Yes.

3 Q. Okay. Or maybe six. I'm sorry. October has
4 31 days, doesn't it? Six days. It was -- it
5 was right -- it was close in time to the
6 general election; is that right?

7 A. That's correct.

8 Q. Okay. Sorry. That was attorney math there.
9 Do you see a header here that says, At
10 Least Nine States Have More Registered Youth
11 This Cycle?

12 A. Yes, I see that.

13 Q. Okay. And then do you see a paragraph
14 underneath there that lists the nine states?

15 A. Yes, I do.

16 Q. Okay. And North Carolina is listed there; is
17 that right?

18 A. Yes, it is.

19 Q. Okay. And if you look on the next page,
20 there's a really handy graphic that's color
21 coded that you can see the change in what
22 they've classified --

23 A. Uh-huh.

24 Q. -- as young people registered to vote as
25 compared to 2020.

1 Do you see that?

2 A. Yes.

3 Q. And does it appear that North Carolina has a
4 2 percent increase as compared to 2020?

5 A. It does.

6 Q. Okay. And here young people is defined as 18
7 to 29; is that right?

8 A. Yes, that's correct.

9 Q. Okay. And are you aware that Tufts also
10 published statistics on the youth vote after
11 the 2024 election?

12 A. Are you saying am I aware or is DEM NC aware?

13 Q. Is Democracy NC, you, sorry, as the
14 organizational witness today.

15 A. Yes, I would say so.

16 Q. Okay.

17 A. Yes.

18 Q. And so does the organization understand that
19 North Carolina's youth turnout was higher
20 than the national average in 2024?

21 A. Yes.

22 MS. RIGGINS: Okay. Can we take two,
23 three minutes? I think I might be done.

24 (Whereupon, there was a recess in the
25 proceedings from 12:14 p.m. to 12:17 p.m.)

GOTV Activities for the 2022 General Election

For the 2022 General Election season (August 16 - November 8, 2022) Democracy North Carolina engaged at least 1,286 organizational and individual advocates in voter outreach and made as many as 27,723,349 touches to potential voters. However, the depth/quality of these voter touches varies greatly, and the impact of them cannot be easily measured, particularly for media and advertising touches. Furthermore, although Democracy NC's contacts turn out to vote at a much higher rate than the statewide turnout rate, voter turnout was down significantly among Democracy NC's contacts compared to previous years. Additional research should work to design data tracking efforts to measure impact of voter touches wherever possible and to explore reasons why Democracy NC's contacts have been turning out lower rates each election season.

Voter Touches	Count
<i>Democracy NC Contact Outreach</i>	241,574
Email Blasts	237,364
Texting	4,179
Phone Banking	31
<i>Community Outreach</i>	2,157,619
NPVE	3,034
Voter Hotline	3,745
Print Resources	2,150,840
<i>Media, Web, and Advertising Outreach</i>	25,324,156
Potential Media Reach	19,000,000
NCVoter Pageviews	304,918
Instagram Impressions	156,882
TikTok Views	12,150
Facebook Impressions	29,581
Twitter Impressions	168,900
Billboards Impressions	3,685,512
Radio	-
Display Network Ads	1,493,213
Streaming Audio Ads	473,000
TOTAL for all Voter Outreach:	27,723,349

GOTV Advocate Actions

The GOTV actions below include opportunities for both organizations (mini-grant recipients, NPVE, Faith Ambassadors, Adopt-a-Precinct Election Protection) and individuals. In recent election cycles, Democracy NC has made an effort to engage more at the local organizational level due to evidence that community members respond better to voter outreach from organizations to which they are already linked. 2022 represented a stepping stone between the nearly all-virtual voter outreach of 2020 due to COVID-19 and the potential to match or exceed our pre-COVID-19 in-person voter outreach efforts in 2024.

Note: These are actions as tracked through Every Action and likely miss many less trackable actions our staff and advocates take on the ground.

2022 GOTV Actions	Count of Supporters
<u>GOTV Mini-Grant Recipients</u>	47
Campus Coordinators	10
Faith Consultants	4



Faith Ambassadors	34*
NPVE Mini-Grant Recipients	21
Resource Requests	166
Elections Advocates	123
Poll Monitors (Individual + AAP)	493
Election Protection Hotline Volunteers	49
Truth Team	50
GOTV Canvassers	6
GOTV Phone bankers	5
Event Attendance (Aug-Nov)	389
TOTAL ADVOCATES ENGAGED:	1,286

*Missing data for Western Piedmont

Recruitment for election-related advocate actions took place via email, social media, and supporter phone banks. The democracync.org website acted as a hub for recruitment for major programs. New attempts were made to increase volunteer recruitment through phone banking, with 114 volunteer recruitment calls attempted and 49 calls completed, both for general volunteers and for the Adopt-a-Precinct Vote Protector program specifically.

Democracync.org housed a "Help Voters" Hub to which interested advocates were directed through email and social media for ways to take action for the election, receiving 417 views. Additional hubs housed within the "Take Action" header included those below. In total, these recruitment hubs reached 4,328 views.

- Election Protection: 1,707 views
- Hotline: 757 views
- Elections Advocacy: 488 views
- Canvass Monitoring: 445 views
- Truth Team: 376 views
- NPVE: 138 views

GOTV Outreach to Democracy NC Contacts

GOTV Email Outreach to Democracy NC Contacts. Throughout the leadup to the 2022 General Election, Democracy NC sent 9 GOTV emails. Due to increased list segmentation and targeting, these 9 emails represented 23 email variations during this time. This resulted in 237,364 supporter touches with a 10.5% open rate overall (nearly 25k opens), and a 0.1% click rate overall (242 clicks). Most emails contained the majority of the voter information in their text, not necessitating a click-through. These email outcomes represent a notable decrease since 2020.

2022 GOTV Email Outcomes

	2022	2020
Blasts Sent	9	11

Supporter Touches	237,364	313,442
Total Open Rate	10.46%	11.86%
Total Opened Email Count	24,837	37,180
Total Click Rate	.10%	.68%
Total Clicked in Email Count	242	2,136
Total Unsubscribe Rate	.11%	.10%
Total Unsubscribe Count	263	308

	Count Supporters	Percent of Emailed Supporters
Received GOTV Email	38,527	-
Opened 1 or more emails	12,178	32%
Opened 2 or more emails	6,335	16%
Clicked 1 or more emails	1,486	4%

GOTV Texting Outreach to Democracy NC Contacts. Due to changes in texting laws, texting was not a major form of GOTV outreach in 2022. New laws only allow organizations to text those who are opted in to texting. Democracy NC sent one GOTV text to infrequent voters who had not already voted reminding them about the last day of Early Voting, resulting in 4,179 voters reached. Of these, 5 voters responded with questions and were helped.

GOTV Phone Banking Outreach to Democracy NC Contacts. In past election cycles, virtual phone banking of Democracy NC contacts or the voter roles was a significant part of Democracy NC's GOTV activities (see example in [2020 Mobilization Report](#)). However, phone banking was not a major part of voter outreach in 2022, with 31 voter outreach calls attempted to infrequent voters among Democracy NC's contacts and 8 completed.

Voting Behavior of Democracy NC Contacts

Of those Democracy NC supporters matched to the voter file, 77% voted in 2022 (compared to a 51% statewide voter turnout rate), a 7% decrease since the last midterm election in 2018 (compared to the 2% statewide decrease in voter turnout from 2018 to 2022) ([NCSBE](#)). Similarly, Black supporter turnout among our supporters decreased by 11% (compared to a 6% statewide decrease in Black voter turnout from 2018 to 2020) ([2022 Turnout Report](#)). Although Democracy NC's supporters turnout at much higher rates than the state as a whole, our supporter turnout rate decreased at a higher rate than the state. Similarly, whereas the statewide voter turnout rate saw a nearly 7% increase from 2016 to 2020, Democracy NC's voter turnout decreased by 3%. This decrease may be in part due to the possibility that our supporters have changed since 2018 due to increased outreach to low-propensity voters, but it is unlikely to be completely explained by that. Further research is needed here.

Supporter Voting History				
	% Total Supporters Voted	% Black Supporters Voted	% Black Women Supporters Voted	% 35 and Under Supporters Voted
2022 General	77%	70%	72%	50%
2022 Primary	51%	50%	52%	26%
2020 General	88%	86%	87%	75%

2020 Primary	72%	66%	68%	47%
2018 General	84%	81%	83%	63%
2018 Primary	53%	48%	50%	27%
2016 General	91%	90%	92%	76%
2016 Primary	80%	74%	76%	55%

Programmatic GOTV Efforts in NC Communities

Democracy NC's efforts to engage voters beyond our existing contacts was conducted through the programs outlined below. Many of these programs operate through the work of advocates - both individuals and organizations - outlined above in the advocate engagement section; other programs reach voters through the direct action of staff.

Nonprofit Voter Engagement works with community-based service providers to engage voters through organizations where they already go. This tactic is a result of research showing voters are more likely to accept voting information from a trusted organization that they know rather than from an unknown organization. Through this program, local organizations distribute voter information, collect voter pledges, and help with voter registration and absentee voting.

<u>NPVE Voter Engagement</u>	<u>Count</u>
Total Potential Voters Engaged	3034
Paper Registration	273
Paper Pledges	532
Paper Absentee Request Forms	35
Checked Voter Registration Online	20
Pledged to Vote Online	527

Election Protection Vote Protectors and Voter Hotline. Democracy NC helps to run a non-partisan voter information hotline in conjunction with its Vote Protector program. Voters can call this hotline themselves with their voting questions or can be connected to the hotline through a Vote Protector at a polling location. The hotline received 3,745 calls in the entire 2022 Midterm Election cycle (Primary and General) (down from a record high in 2020 of 12,977 calls due in large part to the presidential election and COVID-19 crisis) ([2022 Election Protection Report](#)).

Print Resources. A large number of voter touches take place in the form of print resource distribution, both via mail as through our Voter Guides as well as in-person distribution through NPVE, GOTV Mini-Grantees, Faith Ambassadors/Consultants, Campus Coordinators, and directly by staff and volunteers. In total, 2,247,500 resources were printed, and 2,150,840 were confirmed as distributed. However, distribution numbers were not tracked past 9/9/22, so they are most likely missing a large number. Future tracking efforts should try to find a way to track how many resources are distributed and to what organizations/individuals they go throughout the election season; this has been an on-going challenge. If these distribution numbers are accurate, when we look at print resources distribution rates (excluding the Voter Guides which are all direct mailed), we had a distribution rate of around 83%.

<u>Print Resource</u>	<u>Count Printed</u>	<u>Count Confirmed Distributed</u>
Voter Guides - General	2,000,000	2,000,000
Wallet Card (Eng)	50,000	26,950
Wallet Card (Spa)	15,000	7,600
What's on the ballot? - General (Eng)	35,000	23,300

What's On the Ballot? - General (Sp)	N/A (web only)	-
Keep Calm Vote Early (Eng)	40,000	26,200
Keep Calm Vote Early (Sp)	10,000	6,350
Know Your Rights: Voter Intimidation (Eng)	30,000	16,190
Know Your Rights: Voter Intimidation (Sp)	10,000	1,590
Locked up, don't get locked out. (Eng)	30,000	20,000
Locked up, don't get locked out. (Sp)	10,000	5,800
John Lewis fans (2 versions)	17,500	16,860
Total Resources	2,182,500	2,150,840

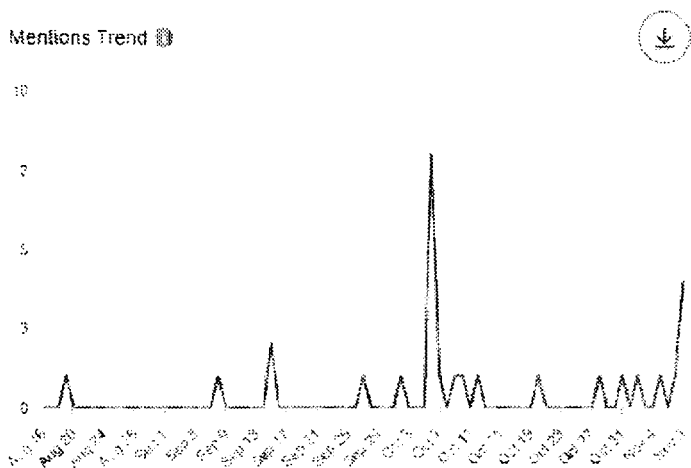
Other GOTV Outreach Programs not Tracked at the Voter Level. We do not have records of how many voters were reached through outreach efforts of our GOTV mini-grantees, Campus Coordinators, or Faith Consultants/Ambassadors. However, some of that outreach may be captured through the number of print resources distributed, as this was a major component of voter outreach for these programs. Efforts should be made to explore ways to track the impact of these programs.

GOTV Outreach through Media, Web, and Advertising

Democracy NC conducts extensive voter outreach and education through earned legacy media, our voter information website (ncvoter.org), social media, and advertising to reach potential voters beyond our own contacts or the contacts of the other organizations with which we work.

Media Coverage. By highlighting voting rule changes, the work of our hotline and vote protectors, and sharing helpful tips for voting, earned legacy media can be a useful way to reach voters outside of our existing networks. In the 2022 General Election period, Democracy NC earned 36 media mentions in news publications, with a total potential reach of 19.1 million readers (according to Meltwater media tracking). This included 2 Spanish-language publications. One limitation of this data is that we cannot be sure that readers were potential NC voters. In 2020, we saw 59 earned media hits in the same time period. This decrease is likely at least in part due to the unusually high press attention on the 2020 Election due to the COVID-19 pandemic and related election rule changes. However, this is an area for further research to see if there are other factors that reduced our media reach in this time period.

Media Hits over Time:



Highest Reaching media hits:



NCVoter.org. NCVoter.org saw a massive dropoff in traffic in 2022 compared to the last two major election cycles despite a full redesign of the website. Organic traffic fell off in large part due to at least three factors: (1) presence of voting information directly in the google search interface, (2) a new voting website by the governor's office that appears in search results before nc voter, (3) an increasing tendency for social media users to seek the information they need in-apps rather than click away to a website. Social traffic is possibly down due to that same tendency to not click away as much when using social media as well as an increase in engagement in facebook overall, and an inability to spend ad money through meta this year due to changes in their election-related ad rules. No money was able to be spent to promote nc voter on social media in 2022; whereas in 2020, coalition partners funded a substantial digital ad campaign. Google search ads were funded in a relatively small amount in 2022. Direct traffic was up from 2018 but down significantly from 2020. Direct traffic comes from people typing in nc voter directly and is likely often from seeing it in print resources (like the voter guides) or on billboards or hearing it in radio/tv ads. One possible explanation is that in 2020, Voting Matters Inc ran over 500 radio ads mentioning nc voter; whereas radio ads in 2022 only directed people to the hotline. Billboards did mention nc voter in 2022 but in much smaller type than the hotline. More research is needed to figure out how to generate more traffic to nc voter in future elections.

NCVoter Traffic over Time

	2022	2020*	2018
Pageviews	304,918	890,027	751,126
Unique Pageviews	261,781	740,107	603,830
Users	193,250	563,763	419,379
Organic Search	134,974	281,490	368,264
Direct	44,018	120,340	33,557
Paid Search	8,133	16,852	0
Referral	5,375	52,640	18,073
Social	2,172	62,184	5,798
Facebook	1,798	59,406	5,353
Instagram	217	1,166	48
Twitter	135	381	357
YouTube	9	13,543	3
SnapChat	1	4,012	0
Email	282	1	13

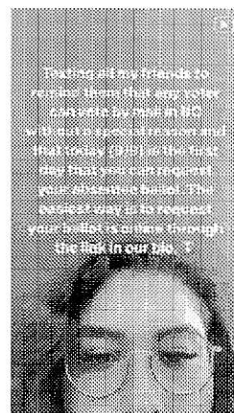
*Includes at least 37k views resulting from paid ad money through coalition partners showing up in social and referral views.
 Most Viewed Page in 2022: Your Ballot & Precinct, Early Voting, Your Sample Ballot, Home, Voter Guides



- 270 followers were added to the Democracy NC Instagram account in the 12 weeks leading up to the election, a 5% increase.
- Content resulted in 156,882 impressions with a reach of 1,078 unique accounts.
- However, only 10 clicks to the Democracy NC link in bio occurred during this time.
- 54% of Democracy NC's audience during that time was under 35.
- Top cities engaged were Raleigh, Durham, Charlotte, Greensboro, and Asheville.



The perfect Halloween costume doesn't
exist.

- Post with highest reach:



PSAL  Starting today, you can use the @NC StateBoardOfEducation's online portal to request your absentee ballot — link in our bio to request yours.  Learn how to Vote By Mail in 3 simple steps @ncvotesnc.org/ncpsal/votebymail #VoteNC

- Reel with Highest Reach:



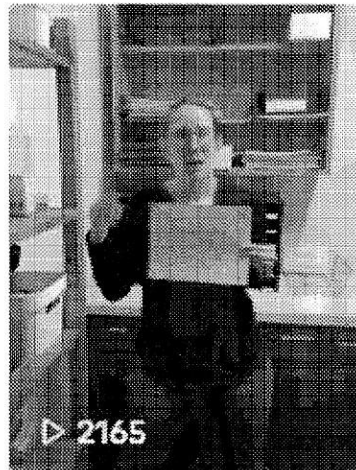
Posted: November 6, 2022 5:37 PM

We love seeing local businesses encourage voter participation!

- Story with highest reach:

TikTok

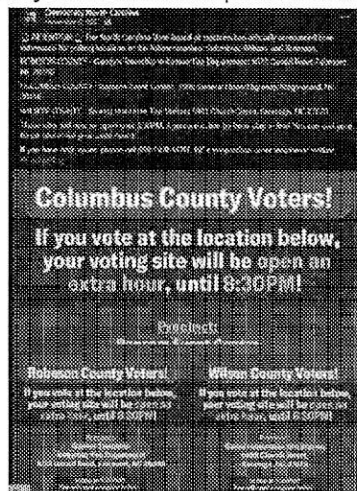
- Democracy NC started a TikTok account on September 30, 2022, posting 25 videos between then and Election Day (11/8/22), resulting in 12,150 views.



- Video with highest views: Fact check: Election r...

Facebook

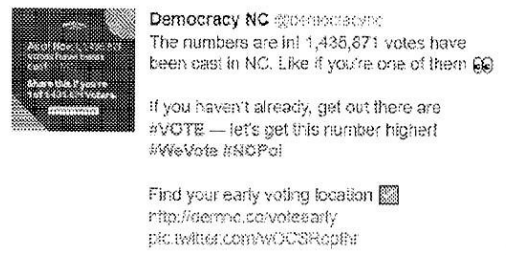
- During election season, Democracy NC's facebook posts made 29,581 impressions and resulted in 88 click throughs.



- Post with the most impressions:

Twitter

- Twitter garnered 168,900 impressions during the election season, resulting in 532 link clicks.



- Tweet with most impressions:

Advertising. Democracy NC worked with the Longleaf Agency to promote ncvoter.org and the Election Protection hotline as well as our post-Election “Count Every Vote” campaign through many channels. The total budget for both campaigns was \$125,000. The hotline and ncvoter.org promotion is reviewed in detail below. Ads ran from 10/20/22 through 11/8/22. (A summary of all ad outcomes can be found here).

Traditional Ad Placement (\$60k). These ad placements included billboards and radio ads. The EP hotline billboard placements yielded total weekly impressions of 1,486,653 over 16 billboards in the first buy and 1,228,504 weekly impressions across 12 billboards in the second buy. Locations included: Burlington, Durham, Johnston County, Rocky Mount, Fayetteville, and New Bern.

Radio ads were placed in Raleigh, Fayetteville, Greensboro, and Charlotte areas including a Male Version and Female Version of the ads featuring the hotline. No metrics were provided on reach for these ads.

Digital Ad Placement (\$50k). No social media ads were placed leading up to the Election due to prohibitions against election-related ads during election season. Some ads were placed for the “Count Every Vote” campaign after the election. However, digital ads were placed in the form of display network ads and streaming audio ads.

Display Network Ads (Non-Social) were placed for the Hotline and NCVoter and were targeted by zip code to select counties across the state. These ads garnered 1,493,213 impressions and 526 clicks.

Streaming Audio Ads (ran 10/31/22 through 11/8/22) were the same audio as radio ads above and resulted in 473k impressions and 412k audio completions.

One Week Away From Election Day, Most States Are Behind 2020 in Youth Voter Registration

October 30, 2024

A CIRCLE analysis of voter file data as of late October shows notable progress among the youngest voters, but major differences by state

Author: Katie Hilton, Sam Searles

Contributors: Alberto Medina, Mariani Germán

Updated with late October 2024 data.

The final CIRCLE analysis of youth voter registration in 41 states shows that the vast majority have fewer young people registered to vote than they did on Election Day 2020. At the same time, there have been increases in some states since early September, particularly among the youngest eligible voters, and there is still time for campaigns and organizations to reach and register youth—especially in the 25 states in the country that have same-day voter registration.

While comparing to 2020 means comparing to a historic year for youth voter participation, the extent to which a majority of states have fewer registered young voters than they did at the time of the 2020 election underscores that registration remains a major barrier to youth voter participation. This data highlights where those barriers are most acute, and where continued youth outreach is most necessary.

At Least Nine States Have More Registered Youth this Cycle

Using voter file data aggregated by Catalist, we calculated the number of youth (ages 18-29) registered to vote in each state with data available as of October 28, 2024, and compared it to the number of youth registered on November 3, 2020. We find that nine states have more youth in that age group registered to vote now than they did in 2020, including major battleground states like Michigan and Nevada, as well as Kansas, Tennessee, Texas, Oklahoma, West Virginia, Colorado, and North Carolina.

The number of states with more registered youth could be higher. Not all states include reliable birth date data in their voter files, meaning voter registration counts are not available for all states. In addition, while we include all states for which we have data in this analysis, more than a dozen states have not updated Catalist voter file data since before September 17 of this year, which was National Voter Registration Day. We note those states in the charts and maps below.

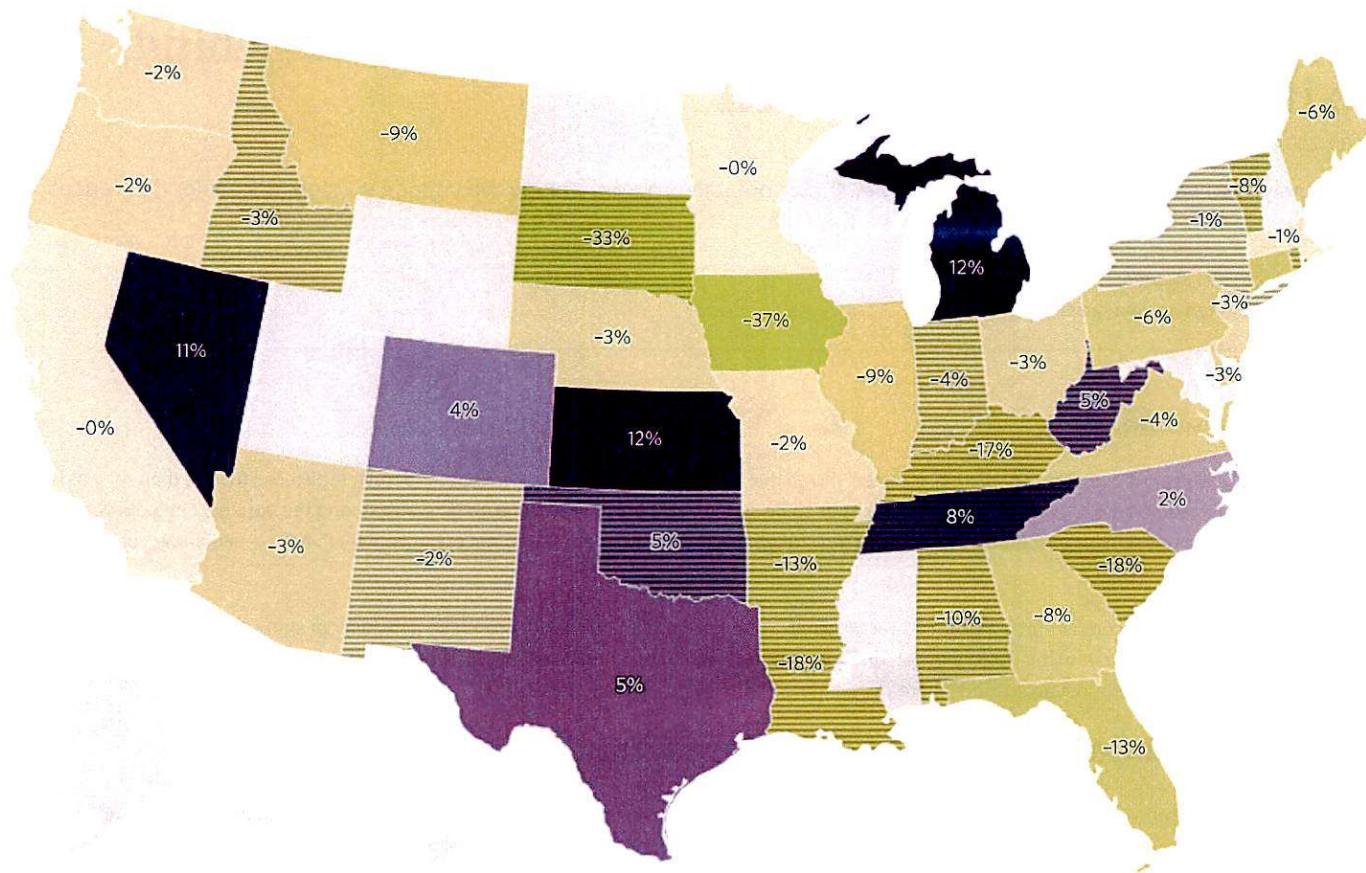


At Least Nine States Have More Young People (Ages 18-29) Registered to Vote this Year than in 2020

The % change in the number of youth (ages 18-29) registered to vote in each state according to data as of late October 2024, compared to the number registered on Election Day 2020.

Change in Number of Young Registered Voters

-37% 0% 12% No new data since September 17, 2024



Note: Data is not available for all states, and not all states have updated their voter file data in recent weeks. States with lines on the map have not updated their data since September 17, 2024, which was National Voter Registration Day.

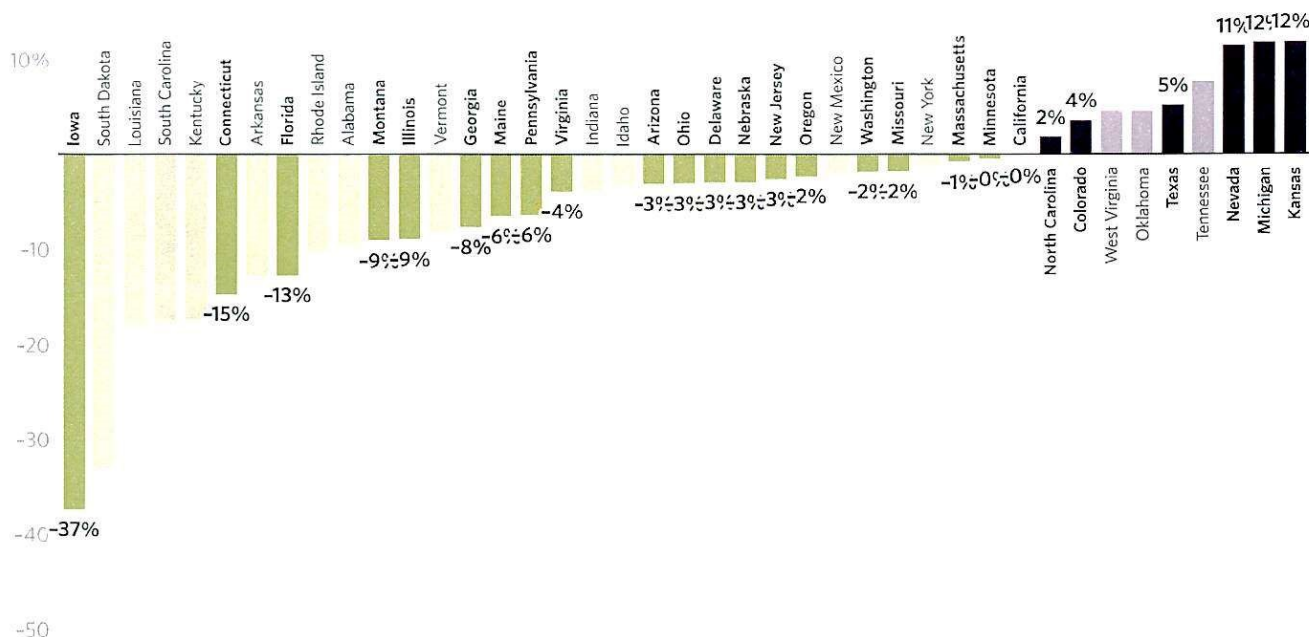
CIRCLE Tufts University Tisch College • CIRCLE

Source: CIRCLE analysis of voter file aggregated by Catalist

[Get the data](#)

At Least Nine States Have More Youth (Ages 18-29) Registered to Vote This Year Than in 2020

The % change in the number of young people (ages 18-29) registered to vote in each state according to data as of late October 2024, compared to the number registered on Election Day 2020



Note: Data is not available for all states, and not all states have updated their voter file data in recent weeks. Faded states in the chart have not updated their data since September 17, 2024, which was National Voter Registration Day.

CIRCLE Tufts University Tisch College · CIRCLE

Source: CIRCLE analysis of voter file data aggregated by Catalist

[Download image](#)

About the Data

When Americans age out of the 18-29 (or, in the case of the data below, 18-19) age group, the number of "youth" registered to vote in that state decreases. Other decreases could also be caused by young people moving away from the state. Therefore, a state will necessarily start any given election cycle with fewer registered youth than in the previous election.

This data can provide a sense of how well a state is doing at registering new young voters: those who have aged into the electorate, those who may have moved to the state, and those who were not previously registered there for whatever reason.

Please note that the data expresses %-change increases or decreases—meaning, the difference between 100,000 youth registered in 2020 and 90,000 in 2024 would be shown as -10%. These numbers do not correspond to what percentage of youth in any given state are registered to vote.

While the majority of states for which we have data have fewer youth registered to youth now than in 2020, more than a dozen of them are only 5% or less behind their November 2020 numbers. However, other states like Florida, Connecticut, and especially Iowa, have much lower youth registration compared to 2020, which could signal lower participation next week.

New Voter Registration Efforts Pay Off


CIRCLE conducts the same registration analysis for youth ages 18-19, newly eligible voters since the 2022 midterm election. In September, all but two states for which we had data had fewer 18- and 19-year-olds registered than in November 2020.

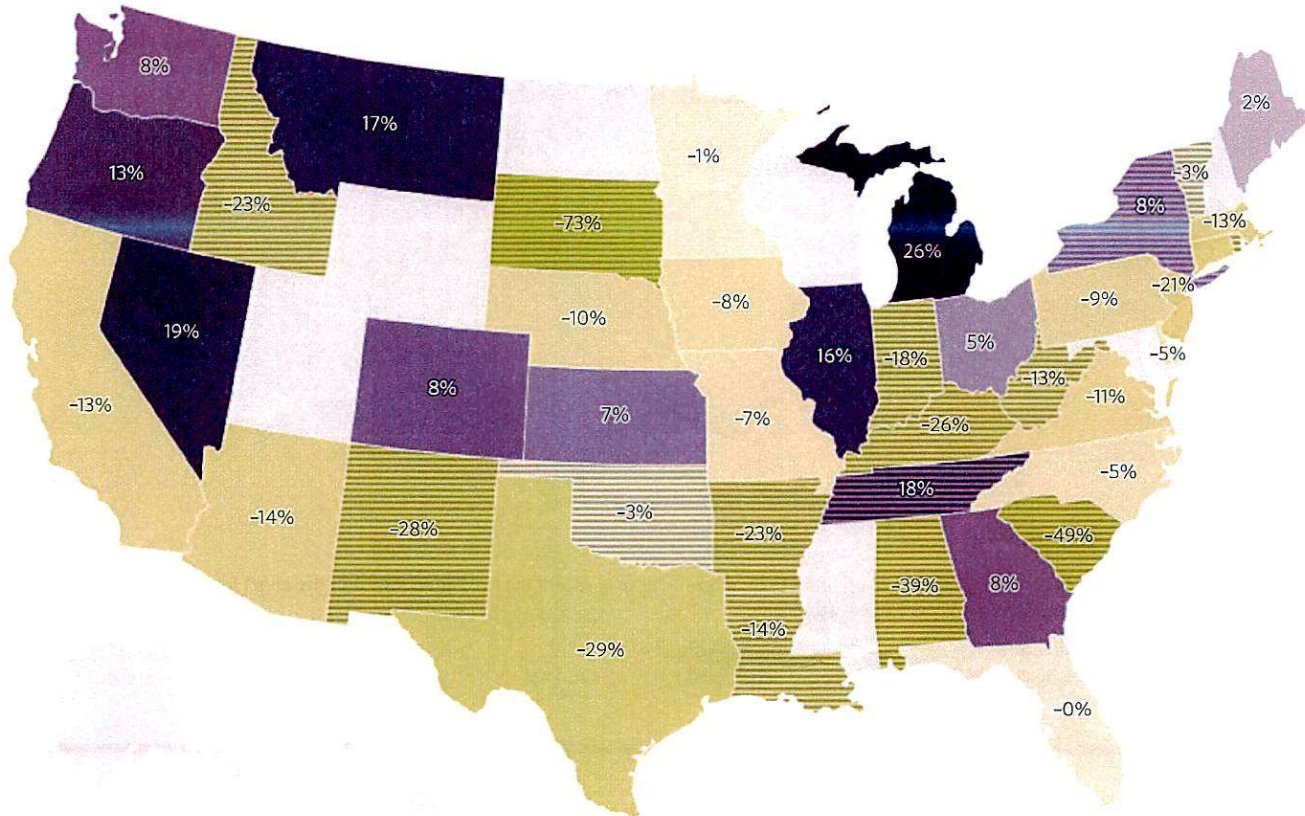
Now, however, 13 states (MI, NV, TN, MT, IL, OR, NY, CO, GA, WA, KS, OH, ME) have more youth in that age group registered to vote than in November 2020. As with the full 18-29 age group, Michigan and Nevada lead the way in registering more new voters.

At Least Thirteen States Have More New Voters (Ages 18-19) Registered to Vote This Year Than in 2020

The % change in the number of newly eligible voters (ages 18-19) registered to vote in each state as of late October 2024, compared to the number registered on Election Day 2020.

Change in Number of Young Registered Voters

-73% 0% 26%  No new data since September 17, 2024



Note: Data is not available for all states, and not all states have updated their voter file data in recent weeks. States with lines on the map have not updated their data since September 17, 2024, which was National Voter Registration Day.

CIRCLE Tufts University Tisch College • CIRCLE

Source: CIRCLE analysis of voter file aggregated by Catalist

[Download image](#)

At Least Thirteen States Have More New Voters (Ages 18-19) Registered This Year Than in 2020

The % change in the number of newly eligible voters (ages 18-19) registered to vote in each state according to data as of late October 2024, compared to the number registered on Election Day 2020



Note: Data is not available for all states, and not all states have updated their voter file data in recent weeks. Faded states in the chart have not updated their data since September 17, 2024, which was National Voter Registration Day.

CIRCLE Tufts University Tisch College • CIRCLE

Source: CIRCLE analysis of voter file data aggregated by Catalist

[Download image](#)

Eleven other states (FL, MN, OK, VT, DE, NC, MO, IA, RI, PA, NE) are 10% or less behind 2020 in the number of youth ages 18-19 registered to vote. Several of these states have same-day registration, so continued outreach could help youth register and vote.

It is notable that more states have improved from their 2020 voter registration numbers among the youngest eligible voters than among all under-30 youth.

New voters usually lag behind in voter registration and turnout

(<https://circle.tufts.edu/latest-research/youth-turnout-among-teens-shows-need-growing-voters/>)

. But it appears that efforts to focus on this age group have paid off in several states, which saw major increases since July in the number of 18- and 19-year-olds registered to vote.

Eleven states have increased their number of registered youth in that age group by 25% or more, with the highest increases in Alabama (+53%), Indiana (+40%), New Mexico (+39%), Tennessee (+37%), and Arizona (+35%).

However, voter participation among the youngest Americans, who are newly eligible to cast a ballot and must register for the first time, remains a persistent challenge. In 2020 we estimated that 46% of youth aged 18-19 cast a ballot

(<https://circle.tufts.edu/latest-research/half-youth-voted-2020-11-point-increase-2016/>)

, compared to 50% of the full 18-29 age group.

In that election, we also tracked lags in youth voter registration among 18- and 19-year-olds compared to 2016. However, most states managed to close those gaps, and by October 2020, a majority of states had more youth in that age group registered to vote

(<https://circle.tufts.edu/latest-research/election-week-2020#youth-voter-registration/>)

than in October 2016. This shows the work can be done, if efforts and resources are poured into voter registration and engagement for this age group.

The 2020 voter registration numbers also show us that these comparative numbers do not necessarily indicate where youth turnout will be strongest. But it is an early indication of states where young people have been reached and engaged and where they may have an impact in this election.